

EXHIBIT “B”

COPY

1 Katherine A. Klimkowski (State Bar No. 263099)
2 JONES DAY
3 3161 Michelson Drive, Suite 800
Irvine, CA 92612-4408
Telephone: (949) 851-3939
Facsimile: (949) 553-7539
Email: kaklimkowski@jonesday.com

5 Attorneys for Defendant
6 EXPERIAN INFORMATION SOLUTIONS, INC.
7
8

CONFORMED COPY
OF ORIGINAL FILED
Los Angeles Superior Court

MAR 14 2014

John A. Clarke, Executive Officer/Clerk
Deputy
SHERIFF'S DEPARTMENT OF LOS ANGELES COUNTY
SHERIFF RUBINSON

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 COUNTY OF LOS ANGELES

11 EDEN KRETCHET,

CASE NO. 14K02478

12 Plaintiff,

13 v.

14 TRANS UNION LLC, EXPERIAN
15 INFORMATION SOLUTIONS INC.
16 EQUIFAX INFORMATION SERVICES
17 LLC, CAPITAL ONE BANK (USA) N.A.,
BANK OF AMERICA CORPORATION,
NATIONAL CREDIT ADJUSTERS LLC,
CALIFORNIA BUSINESS BUREAU INC.,
LVNV FUNDING LLC, DOES 1 TO 10,
18 INCLUSIVE,

NOTICE OF FILING NOTICE OF
REMOVAL

Complaint Filed: February 14, 2014

19 Defendants.

20
21 Pursuant to 28 U.S.C. § 1446(d), Experian hereby provide notice to Plaintiff and the Clerk
22 of the Superior Court of the State of California, County of Los Angeles, that on the 14th day of
23 March 2014, Experian caused to be filed in the United States District Court for the Central
24 District of California, a Notice of Removal removing the above-styled action to the United States
25 District Court for the Central District of California. A copy of the Notice of Removal is attached
26 hereto as Exhibit 1 (with exhibits). The filing of the Notice of Removal in Federal Court,
27 together with the filing of the Notice of Filing of Removal in this Court pursuant to 28 U.S.C. §
28 1446(d), effected immediate removal of the action from this Court to the United States District

IRI-60818v1

NOTICE OF FILING OF REMOVAL

1 Court for the Central District of California.

2

3 Dated: March 14, 2014

JONES DAY

4 By: 

5 Katherine A. Klimkowski

6

7 Attorneys for Defendant

8 EXPERIAN INFORMATION SOLUTIONS,

9 INC.

EXHIBIT 1

COPY

FILED

1 Katherine A. Klimkowski (SBN 263099)
2 kaklimkowski@jonesday.com
3 JONES DAY
4 3161 Michelson Drive, Suite 800
5 Irvine, CA 92612-4408
6 Telephone: (949) 851-3939
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8 Attorneys for Defendant
9 EXPERIAN INFORMATION SOLUTIONS,
10 INC.

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14 UNITED STATES DISTRICT COURT
15
16 CENTRAL DISTRICT OF CALIFORNIA

17 EDEN KRETCHET,

18 Plaintiff,

19 v,

20 TRANS UNION LLC, EXPERIAN
21 INFORMATION SOLUTIONS INC.
22 EQUIFAX INFORMATION
23 SERVICES LLC, CAPITAL ONE
24 BANK (USA) N.A., BANK OF
25 AMERICA CORPORATION,
26 NATIONAL CREDIT ADJUSTERS
27 LLC, CALIFORNIA BUSINESS
28 BUREAU INC., LVNV FUNDING
LLC, DOES 1 TO 10, INCLUSIVE,,

Defendants.

Case No. CV14-01953 DMG (RZx)

**NOTICE OF REMOVAL OF
ACTION: UNDER 28 U.S.C. §
1441**

[FEDERAL QUESTION]

21
22 Pursuant to 28 U.S.C. § 1441 *et seq.*, Defendant Experian Information
23 Solutions, Inc. ("Experian") hereby files a Notice of Removal for the above-
24 captioned action to this Court.

25 In further support of this Notice, Experian states:

26 1. Experian, is a named Defendant in Civil Action No. Doc. 14K02478
27 filed in the Superior Court of the State of California, County of Los Angeles (the
28 "State Court Action").

1 2. The Complaint in the State Court Action was filed with the Clerk of
2 the Superior Court of the State of California, County of Los Angeles on
3 February 14, 2014. Defendant Experian was served with the complaint on February
4 14, 2014.

5 3. This Notice is being filed with this Court within thirty (30) days after
6 Defendant Experian received a copy of Plaintiff's initial pleadings setting forth the
7 claims for relief upon which Plaintiff's action is based.

8 4. Pursuant to 28 U.S.C. § 1446(a), attached hereto as Exhibit A is a true
9 and correct copy of all substantive records and proceedings from the state court.

10 5. Pursuant to 28 U.S.C. § 1446(d), Experian shall file a copy of this
11 Notice of Removal with the clerk of the State Court Action, and shall serve Plaintiff
12 through her attorney of record in the State Court Action with this Notice promptly
13 after its filing.

14 6. Experian is a corporation which, for monetary fees, regularly engages
15 in whole or in part in the practice of assembling consumer credit information or
16 other information on consumers for the purpose of furnishing consumer reports to
17 third parties. Experian uses means or facilities of interstate commerce for the
18 purpose of preparing or furnishing consumer reports, and therefore is a "consumer
19 reporting agency" within the meaning of 15 U.S.C. § 1681a(f).

20 7. The claims of relief against Experian alleged in the State Court Action
21 arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681-1681u. Thus, this
22 court has original subject matter jurisdiction over the above-captioned action
23 pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action
24 may properly be removed to this United States District Court pursuant to 28 U.S.C.
25 § 1441(a) and (b).

26 8. Defendant Experian does not waive any defense to the Complaint,
27 including but not limited to lack of service, improper service, or lack of personal
28 jurisdiction.

1 WHEREFORE, Experian notices the removal of this case to the United
2 States District Court for the Central District of California pursuant to 28 U.S.C. §
3 1441 *et seq.*

4

5 Dated: March 14, 2014

JONES DAY

6

7 By:

8 
Katherine A. Klimkowski

9

10 Attorneys for Defendant
11 EXPERIAN INFORMATION
12 SOLUTIONS, INC.

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EXHIBIT A

02/14/2014
2-58
2 pm

SUM-100

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

FEB 14 2014

Sherri R. Carter, Executive Officer/Clerk
By: Paul So, DeputyNOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):

TRANS UNION LLC, EXPERIAN INFORMATION SOLUTIONS INC, "Additional Parties Attachment Form is attached."

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

EDEN KRETCHET

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO!** *Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.*

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.suerte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.suerte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):LOS ANGELES SUPERIOR COURT - CENTRAL DISTRICT
111 NORTH HILL STREET, LOS ANGELES CA 90012CASE NUMBER:
(Número del Caso):

14 K 0 2 4 7 8

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
EDEN KRETCHET - 11137 FREER STREET, TEMPLE CITY CA 91780-3606 - (949) 600-0380DATE:
(Fecha)SHERRI R. CARTER Clerk, by
(Secretario)

PAUL SO

, Deputy
(Adjunto)(For proof of service of this summons, use Proof of Service of Summons (form POS-010).
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

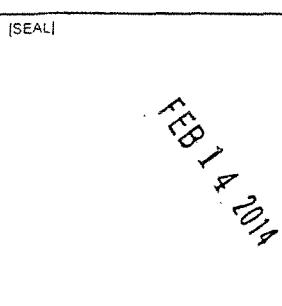
NOTICE TO THE PERSON SERVED: You are served

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify):

3. on behalf of (specify): *EXPERIAN INFORMATION SERVICES, INC.*

under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):

4. by personal delivery on (date):



SUM-200(A)

SHORT TITLE: KRETCHET v. TRANS UNION LLC	CASE NUMBER:
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INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

Plaintiff Defendant Cross-Complainant Cross-Defendant

EQUIFAX INFORMATION SERVICES LLC, CAPITAL ONE BANK (USA) N.A., BANK OF AMERICA CORPORATION, NATIONAL CREDIT ADJUSTERS LLC, CALIFORNIA BUSINESS BUREAU INC, LVNV FUNDING LLC, DOES 1 TO 10 INCLUSIVE.

Page _____ of _____
Page 1 of 1

1 EDEN KRETCHET
2 11137 Freer Street
3 Temple City, CA 91780
(949) 600-0380

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

FEB 14 2014

4 Plaintiff in propria persona

5 Sherri R. Carter, Executive Officer/Clerk
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By: Paul So, Deputy

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES – CENTRAL DISTRICT

STANLEY MOSK COURTHOUSE

EDEN KRETCHET,) CASE NUMBER

Plaintiff,) COMPLAINT FOR: 14 K 0 2 4 7 8
)
vs.) 1. DAMAGES FOR VIOLATION
() OF THE CONSUMER CREDIT
TRANS UNION LLC, EXPERIAN) REPORTING AGENCIES ACT
INFORMATION SOLUTIONS INC,) [CC §1785.1 et seq.]
EQUIFAX INFORMATION)
SERVICES LLC, CAPITAL ONE) 2. PUNITIVE DAMAGES
BANK (USA) N.A., BANK OF)
AMERICA CORPORATION,)
NATIONAL CREDIT ADJUSTERS)
LLC, CALIFORNIA BUSINESS)
BUREAU INC, LVNV FUNDING)
LLC, DOES 1 TO 10 INCLUSIVE.)
Defendants.)

(Exceeds \$10,000.00 does not exceed \$25,000.00 – Action a Limited Civil Case)

Plaintiff alleges as follows:

PRELIMINARY ALLEGATIONS

1. Plaintiff, EDEN KRETCHET (“PLAINTIFF”), is an individual over the
age of 18 years who resides at 11137 Freer Street, Temple City, California 91780.

COMPLAINT

2. Defendant, TRANS UNION LLC (“TUC”), is a State of Delaware Limited Liability Company conducting business as a Consumer Credit Reporting Agency as defined by Section 1785.3(d) of the Civil Code of the State of California and is authorized to conduct business in the State of California.

3. Defendant, EXPERIAN INFORMATION SOLUTIONS INC ("XPN"), is a State of Ohio Corporation conducting business as a Consumer Credit Reporting Agency as defined by Section 1785.3(d) of the Civil Code of the State of California and is authorized to conduct business in the State of California.

4. Defendant, EQUIFAX INFORMATION SERVICES LLC ("EFX") is a State of Georgia Limited Liability Company conducting business as a Consumer Credit Reporting Agency as defined by Section 1785.3(d) of the Civil Code of the State of California and is authorized to conduct business in the State of California.

5. Defendant, CAPITAL ONE BANK (USA) N.A. ("CAP ONE") is a Federal National Bank and is authorized to conduct business in the State of California.

6. Defendant, LVNV FUNDING LLC (“LVNV”) is a Limited Liability Company of unknown jurisdiction and is not registered as a business entity with the California Secretary of State and as such, is not authorized to conduct business in the State of California.

7. Defendant, NATIONAL CREDIT ADJUSTERS LLC ("NCA"), is a State of Kansas Limited Liability Company. NCA has had its registration status with the California Secretary of State forfeited and as such, is not authorized to conduct business in the State of California.

COMPLAINT

1 8. Defendant, CALIFORNIA BUSINESS BUREAU INC. ("CBB") is a
2 California Corporation authorized to conduct business in the State of California. CBB
3 is a collection agency.
4

5 9. Defendant, BANK OF AMERICA CORPORATION ("BAC"), is a State
6 of Delaware Corporation authorized to conduct business in the State of California.
7

8 10. PLAINTIFF is ignorant of the true names and capacities of
9 Defendants sued herein as Does 1 to 10 and therefore sue these Defendants by such
10 fictitious names. PLAINTIFF will amend this Complaint to allege the true names
11 and capacities when ascertained.
12

13 11. PLAINTIFF is informed and believe and thereon alleges that at all
14 times herein mentioned each of the Defendants were the agents, servants and
15 employees of their codefendants and in doing the things hereinafter alleged were
16 acting in the scope of their authority as such agents, servants and employees with the
17 permission and consent of their codefendants.
18

19 12. This judicial district is the proper venue for this action because
20 PLAINTIFF lives in this judicial district.
21

FIRST CAUSE OF ACTION

Violation of Consumer Credit Reporting Act - Count One Against Defendants: CBB, CAP ONE, XPN, TUC, EFX, DOES 1 - 5

22 23. On or about July through September 2013, in writing, PLAINTIFF
23 disputed to these Defendants, and each of them, that they were reporting the same
24 negative account information multiple times in violation of the Fair Credit Reporting Act.
25
26 Subsequently, these Defendants, and each of them failed and refused and do fail and
27
28

COMPLAINT

1 refuse to correct said erroneous multiple reports of the same account.
2

3 14. As a direct result of these Defendants conduct in maintaining and
4 reporting this inappropriate information to potential credit grantors and others,
5 PLAINTIFF has been, is and will continue to be denied licensing, credit or is being
6 denied more favorable credit terms, all of which has been and is damaging in a
7 sum uncertain to PLAINTIFF who asks leave of the court to amend this Complaint to
8 state said sum when the same becomes known to him.
9

10 15. Because of Defendants' conduct as above alleged, PLAINTIFF is entitled
11 to punitive damages pursuant to Section 1785.31(B) of the Civil Code of the State of
12 California of not less than \$100 nor more than \$5,000 for each violation of the Act.
13

SECOND CAUSE OF ACTION

Violation of Consumer Credit Reporting Act - Count Two Against Defendants: BAC, NCA, LVNV, XPN, TUC, EFX, DOES 6 - 10

16. PLAINTIFF realleges all of the allegations contained in paragraphs 1
17 through 12 above as though fully stated herein.
18

19 17. On or about July through September 2013, in writing, PLAINTIFF
20 disputed to these Defendants, and each of them, that they were reporting certain
21 negative account information in which the delinquency of the account was being reported
22 as having occurred much more recently than was actually the case in violation of the Fair
23 Credit Reporting Act. Subsequently, these Defendants, and each of them failed and
24 refused and do fail and refuse to correct said erroneous dating of the purported delinquent
25 dating of the account.
26

27 18. As a direct result of these Defendants conduct in maintaining and
28

COMPLAINT

1 reporting this inappropriate information to potential credit grantors and others,
2 PLAINTIFF has been, is and will continue to be denied licensing, credit or is being
3 denied more favorable credit terms, all of which has been and is damaging in a
4 sum uncertain to PLAINTIFF who asks leave of the court to amend this Complaint to
5 state said sum when the same becomes known to him.

6
7 19. Because of Defendants' conduct as above alleged, PLAINTIFF is entitled
8 to punitive damages pursuant to Section 1785.31(B) of the Civil Code of the State of
9 California of not less than \$100 nor more than \$5,000 for each violation of the Act.

10
11 20. Plaintiff remits to the jurisdictional limit of the court.

12 **WHEREFORE**, Plaintiff prays for judgment as follows:

13 **ON THE FIRST CAUSE OF ACTION**

14 **Against Defendants: CBB, CAP ONE, XPN, TUC, EFX, DOES 1 - 5**

15
16 1. For actual damages according to proof;
17
18 2. for punitive damages of not less than \$100 nor more than \$5,000;

19 **ON THE SECOND CAUSE OF ACTION**

20 **Against Defendants: BAC, NCA, LVNV, XPN, TUC, EFX, DOES 6 - 10**

21
22 3. for actual damages according to proof;
23
24 4. for punitive damages of not less than \$100 nor more than \$5,000;

25 **ON ALL CAUSES OF ACTION**

26 **Against all Defendants:**

27
28 5. for attorney fees, if any;
5. for cost of suit;

COMPLAINT

1
2 7. for such further relief the court may deem just and equitable.
3

4 Dated: February 14, 2014
5

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8 EDEN KRETCHET
9 Plaintiff in propria persona
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COMPLAINT

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

4 In re Los Angeles Superior Court Cases General) Case No.: 14 K 0 2 4 7 8
5 Order - Limited Jurisdiction (Non-Collections))
6 Cases) GENERAL ORDER
7)
8)

TO EACH PARTY AND TO THE ATTORNEY OF RECORD FOR EACH PARTY:

Pursuant to the California Code of Civil Procedure, the California Rules of Court, and the Los Angeles County Court Rules, the COURT HEREBY GENERALLY ORDERS AS FOLLOWS IN THIS ACTION:

**1. PLAINTIFF/S IS/ARE ORDERED TO SERVE A COPY OF THIS
GENERAL ORDER ON THE DEFENDANT/S WITH COPIES OF THE SUMMONS
AND COMPLAINT AND TO FILE PROOF OF SERVICE, AS MANDATED IN THIS
ORDER. (Code Civ. Proc., § 594, subd. (b).)**

2. The Court sets the following trial date in this case in Department 77 at the Stanley Mosk Courthouse, 111 North Hill Street, Los Angeles, CA 90012:

POS: 08 / 14 / 2014 TRIAL: 08 / 14 / 2015 OSC: 02 / 14 / 2017

TRIAL: • Date: _____ at 8:30 a.m.

SERVICE OF SUMMONS AND COMPLAINT

27 3. The trial date set forth above is conditioned on the defendant/s being served
28 with the summons and complaint within six (6) months of the filing of the complaint. The

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
NOTICE OF CASE PROCEDURES & REQUIREMENTS LIMITED CIVIL
(NON-COLLECTION) ACTIONS**

Case Number: _____

THIS FORM WILL BE POSTED IN THE COURTROOM AND ON THE COURT'S WEBSITE

LIMITED JURISDICTION CASE MANAGEMENT PROCEDURES AND INSTRUCTIONS

The following critical provisions, as applicable in the Central District are cited for your information:

TIME STANDARDS:

COMPLAINTS: All complaints should be served and the proof of service filed within 60 days after filing of the complaint.

CROSS-COMPLAINTS: Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints against parties new to the action must be served and the proof of service filed within 30 days after the filing of the cross-complaint. A cross-complaint against a party who has already appeared in the action must be accompanied by proof of service of the cross-complaint at the time it is filed (Code Civ. Proc. §428.50).

DEFAULTS: (Local Rule 9.10, Cal. Rules of Court, rule 3.110(g)). If a responsive pleading is not served within the time to respond and no extension of time has been granted, the plaintiff should file a Request for Entry of Default within 10 calendar days after the time to respond has elapsed. The plaintiff should request default judgment on the defaulting defendants within 40 calendar days after entry of default. Requests for entry of default judgments will only be considered based upon written submissions.

NOTICED MOTIONS: All regularly noticed pre-trial motions will be heard in the Limited Civil Courtroom on Mondays, Tuesdays, Wednesdays and Thursdays at 8:30 a.m. and will require parties to reserve a hearing date in Department 77. Motions for Summary Judgment must be identified at the time of reservation. All motions should be filed in Room 102. Tentative rulings may be posted on the Court's internet site, <http://www.lasuperiorcourt.org/tentative ruling>, the day prior to the hearing.

EX-PARTE MATTERS: All pre-trial ex-parte applications should be noticed in the Limited Civil Court, Department 77 for 1:30 p.m. Ex parte appearance applications for Department 77 will be heard daily and must be filed by 1:00 p.m. daily in Room 102 on the day of the hearing.

UNINSURED MOTORISTS CLAIMS: Delay Reduction Rules do not apply to uninsured motorist claims. The plaintiff must file a Notice of Designation with the Court, identifying the case as an uninsured motorist claim under Insurance Code section 11580.2

2/7/13

Exh. A Page 13

Exhibit B, Page 036

1 trial date will be continued to a later date if service is not accomplished within six (6)
2 months. The parties may stipulate to keep the original trial date even if service of the
3 summons and complaint is not completed within six (6) months of the filing of the original
4 complaint.

5 4. The summons and complaint shall be served upon the defendant/s within three
6 (3) years after the complaint is filed in this action. (Code Civ. Proc., § 583.210, subd. (a).)
7 Failure to comply will result in dismissal, without prejudice, of the action, as to all unserved
8 parties who have not been dismissed as of that date. (Code Civ. Proc., § 581, subd. (b)(4).).
9 The dismissal as to the unserved parties, without prejudice, for this case shall be effective on
10 the following date:
11

12

UNSERVED PARTIES DISMISSAL DATE

13

14 5. No Case Management Review (CMR) will be conducted in this case.
15

16 **LAW AND MOTION**
17

18 6. All regularly noticed pre-trial motions will be heard in Department 77 on
19 Mondays, Tuesdays, Wednesdays, and Thursdays at 8:30 a.m. Motions will require parties
20 to reserve a hearing date by calling (213) 974-6247. All motions should be filed in Room
21 102 of the Stanley Mosk Courthouse.
22

23 7. Tentative rulings may be posted on the Court's internet site at
24 <http://www.lasuperiorcourt.org/tentativeruling> the day prior to the hearing.
25

EX PARTE APPLICATIONS

8. Ex parte applications should be noticed for 1:30 p.m. in Department 77. All applications must be filed by 1:00 p.m. in Room 102 of the Stanley Mosk Courthouse.

JURY FEES

9. The fee shall be due no later than 365 calendar days after the filing of the initial complaint. (Code Civ. Proc., § 631, subds. (b) and (c).)

STIPULATION TO CONTINUE TRIAL

10. A trial will be postponed if all attorneys of record and/or the parties who have appeared in the action stipulate in writing to a specific continued date. If the Stipulation is filed less than five (5) court days before the scheduled trial date, then a courtesy copy of the stipulation must be filed in Department 77. The stipulation and order should be filed in Room 102 of the Stanley Mosk Courthouse with the required filing fees. (Code Civ. Proc., § 595.2 and Govt. Code § 70617, subd. (c)(2).)

TRIAL

11. Parties are to appear on the trial date ready to go to trial, and must meet and confer on all pretrial matters at least 20 calendar days before the trial date. On the day of trial the Parties shall bring with them to Department 77 all of the following:

- i. Joint Statement of the Case;
- ii. Motions in Limine, which must be served and filed in accordance with the Local Rules of the Los Angeles Superior Court (LASC), see local rule 3.57;
- iii. Joint Witness List disclosing the witnesses who will be called what they will testify to, and how long their testimony will take;
- iv. Joint Exhibits in exhibit books, numbered appropriately, and Exhibit List;

1 v. Joint Proposed Jury Instructions printed out for the court; and

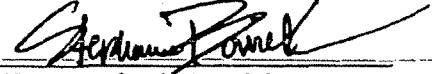
2 vi. Joint Proposed Verdict form(s) printed out for the court.

3 **12. FAILURE TO COMPLY WITH ANY REQUIREMENT SET FORTH**

4 **IN PARAGRAPH 11 ABOVE MAY RESULT IN SANCTIONS OR THE VACATING**
5 **OF THE TRIAL DATE. (Los Angeles Superior Court Local Rule 3.37.)**

6
7
8 GOOD CAUSE APPEARING THEREFORE, IT IS SO ORDERED.

9
10
11 DATE: March 13, 2013

12 
13 Hon. Stephanie Bowick
14 Judge of the Superior Court

SHORT TITLE: KRETCHET v. TRANS UNION LLC	CASE NUMBER 14 K 0 2 4 7 8
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**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 3 HOURS/ DAYS

Item II. Indicate the correct district and courthouse location (4 steps – If you checked “Limited Case”, skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

1. Class actions must be filed in the Stanley Mosk Courthouse, central district. 2. May be filed in central (other county, or no bodily injury/property damage). 3. Location where cause of action arose. 4. Location where bodily injury, death or damage occurred. 5. Location where performance required or defendant resides.	6. Location of property or permanently garaged vehicle. 7. Location where petitioner resides. 8. Location wherein defendant/respondent functions wholly. 9. Location where one or more of the parties reside. 10. Location of Labor Commissioner Office
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Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/ Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

SHORT TITLE: KRETCHET v. TRANS UNION LLC	CASE NUMBER
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A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation	Number of parcels _____ 2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE: KRETCHET v. TRANS UNION LLC		CASE NUMBER	
Judicial Review	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.
	Miscellaneous Civil Complaints		
Miscellaneous Civil Petitions			

SHORT TITLE: KRETCHET v. TRANS UNION LLC	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.		ADDRESS: 11137 FREEER STREET, TEMPLE CITY CA 91780-3606
CITY: TEMPLE CITY	STATE: CA	ZIP CODE: 91780-3606

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: 02/14/2014


Edna Hart
 (SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

COPY

1 Katherine A. Klimkowski (State Bar No. 263099)
2 JONES DAY
3 3161 Michelson Drive, Suite 800
4 Irvine, CA 92612-4408
5 Telephone: (949) 851-3939
6 Facsimile: (949) 553-7539
7 Email: kaklimkowski@jonesday.com

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAR 13 2014

Sherri R. Carter, Executive Officer/Clerk
By: Candice S. Calagna, Deputy

5 Attorneys for Defendant
6 EXPERIAN INFORMATION SOLUTIONS, INC.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

10 **STANLEY MOSK COURTHOUSE**

12 EDEN KRETCHET,

CASE NO. 14K02478

13 Plaintiff,

14 v.

15 TRANS UNION LLC, EXPERIAN
16 INFORMATION SOLUTIONS INC,
17 EQUIFAX INFORMATION SERVICES
18 LLC, CAPITAL ONE BANK (USA) N.A.,
19 BANK OF AMERICA CORPORATION,
NATIONAL CREDIT ADJUSTERS LLC,
CALIFORNIA BUSINESS BUREAU INC,
LVNV FUNDING LLC, DOES 1 TO 10,
INCLUSIVE.

**DEFENDANT EXPERIAN
INFORMATION SOLUTION INC.'S
ANSWER AND AFFIRMATIVE
DEFENSES TO PLAINTIFF EDEN
KRETCHET'S COMPLAINT**

Complaint Filed: February 14, 2014

20 Defendants.

22 COMES NOW Defendant Experian Information Solutions, Inc. ("Experian"), by and
23 through its undersigned counsel, and answers Plaintiff Eden Kretchet's ("Plaintiff") Complaint as
24 follows:

GENERAL DENIAL

26 Pursuant to section 431.30(d) of the California Code of Civil Procedure, Experian denies,
27 generally and specifically, each and every allegation of the Complaint. Experian further denies
28 that Plaintiff has suffered, or will suffer, any injury, detriment, damage or loss, or is entitled to

IRI-60878v1

EXPERIAN'S ANSWER AND AFFIRMATIVE DEFENSES TO COMPLAINT

1 costs, expenses or attorneys' fees in any matter or sum whatsoever, by reason of any act or
2 omission of Experian, its agents, employees and/or anyone acting on Experian's behalf. Experian
3 further denies that Plaintiff is entitled to the relief sought, or to any relief whatsoever.

4 **AFFIRMATIVE DEFENSES**

5 As separate and distinct affirmative defenses to the Complaint, Experian alleges as
6 follows:

7 **FIRST AFFIRMATIVE DEFENSE**

8 **(FAILURE TO STATE A CLAIM AGAINST EXPERIAN)**

9 1. The Complaint, and each purported cause of action therein, fails to state facts
10 sufficient to constitute a cause of action against Experian and further fails to state facts sufficient
11 to entitle Plaintiff to the relief sought, or to any other relief whatsoever, from Experian.

12 **SECOND AFFIRMATIVE DEFENSE**

13 **(IMMUNITY)**

14 2. Plaintiff's claims are barred as against Experian by the qualified immunity of
15 U.S.C. § 1681h(e).

16 **THIRD AFFIRMATIVE DEFENSE**

17 **(WAIVER)**

18 3. Plaintiff's claims are barred, in whole or in part, by the doctrine of waiver.

19 **FOURTH AFFIRMATIVE DEFENSE**

20 **(TRUTH/ACCURACY)**

21 4. Plaintiff's claims are barred as against Experian because all information Experian
22 communicated to any third person regarding Plaintiff was true.

23 **FIFTH AFFIRMATIVE DEFENSE**

24 **(FAILURE TO MITIGATE DAMAGES)**

25 5. Plaintiff has failed to mitigate her damages.

26 **SIXTH AFFIRMATIVE DEFENSE**

27 **(LACHES)**

28 6. The Complaint and each claim for relief therein is barred by laches.

SEVENTH AFFIRMATIVE DEFENSE
(CONTRIBUTORY/COMPARATIVE FAULT)

7. Experian is informed and believes and thereon alleges that any alleged damages sustained by Plaintiff was, at least in part, caused by the actions of Plaintiff herself and resulted from Plaintiff's own negligence which equaled or exceeded any alleged negligence or wrongdoing by Experian.

EIGHTH AFFIRMATIVE DEFENSE
(ESTOPPEL)

9 8. Any damages that Plaintiff may have suffered, which Experian continues to deny,
10 were the direct and proximate result of the conduct of Plaintiff. Therefore, Plaintiff is estopped
11 and barred from recovery of any damages whatsoever as against Experian.

NINTH AFFIRMATIVE DEFENSE
(STATUTE OF LIMITATIONS)

14 9. Experian is informed and believes and thereon alleges that all claims for relief in
15 the Complaint against Experian are barred by the applicable statutes of limitation.

TENTH AFFIRMATIVE DEFENSE
(INTERVENING CAUSE)

18 10. Plaintiff's alleged damages, which Experian continues to deny, were not caused by
19 Experian but by an independent intervening cause, including but not limited to accurate negative
20 information regarding Plaintiff.

ELEVENTH AFFIRMATIVE DEFENSE
(UNCLEAN HANDS)

23 11. The Complaint, and each claim for relief therein that seeks equitable relief, is
24 barred by the doctrine of unclean hands.

TWELFTH AFFIRMATIVE DEFENSE

(INDEMNIFICATION)

27 12. Experian is informed and believes and thereon alleges that any purported damages
28 allegedly suffered by Plaintiff are the results of the acts or omissions of third persons over whom

1 Experian had neither control nor responsibility.

2 **THIRTEENTH AFFIRMATIVE DEFENSE**

3 **(IMPROPER REQUEST FOR PUNITIVE DAMAGES)**

4 13. Plaintiff's Complaint does not allege facts sufficient to rise to the level of conduct
5 required to recover punitive damages, and thus all requests for punitive damages are improper.

6 **FOURTEENTH AFFIRMATIVE DEFENSE**

7 **(RIGHT TO ASSERT ADDITIONAL DEFENSES)**

8 14. Experian reserves the right to assert additional affirmative defenses at such time
9 and to such extent as warranted by discovery and the factual developments in this case.

10 **PRAYER FOR RELIEF**

11 WHEREFORE, Defendant Experian prays as follows:

12 1. That Plaintiff take nothing by reason of the Complaint herein;
13 2. That the Complaint be dismissed in its entirety as to Experian;
14 3. That Experian be awarded costs of suit and reasonable attorneys' fees incurred
15 herein; and
16 4. For such other and further relief as the Court may deem just and proper.

17
18 Dated: March 13, 2014

JONES DAY

19
20 By: 
21 Katherine A. Klimkowski

22 Attorneys for Defendant
23 EXPERIAN INFORMATION SOLUTIONS,
24 INC.

PROOF OF SERVICE BY MAIL

I, Estelle S. Pete, am a citizen of the United States and employed in Orange County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 3161 Michelson Drive, Suite 800, Irvine, California 92612-4408. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. On March 13, 2014, I placed with this firm at the above address for deposit with the United States Postal Service a true and correct copy of the within document(s):

**DEFENDANT EXPERIAN INFORMATION SOLUTION INC.'S ANSWER
AND AFFIRMATIVE DEFENSES TO PLAINTIFF EDEN KRETCHET'S
COMPLAINT**

11 in a sealed envelope, postage fully paid, addressed as follows:

15 Following ordinary business practices, the envelope was sealed and placed for collection
16 and mailing on this date, and would, in the ordinary course of business, be deposited with the
17 United States Postal Service on this date.

18 I declare under penalty of perjury under the laws of the State of California that the above
19 is true and correct.

20 Executed on March 13, 2014, at Irvine, California.

Estelle S. Pete

PROOF OF SERVICE BY MAIL

I, Estelle S. Pete, am a citizen of the United States and employed in Orange County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 3161 Michelson Drive, Suite 800, Irvine, California 92612-4408. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. On March 14, 2014, I placed with this firm at the above address for deposit with the United States Postal Service a true and correct copy of the within document(s):

NOTICE OF REMOVAL OF ACTION: UNDER 28 U.S.C. § 1441

in a sealed envelope, postage fully paid, addressed as follows:

Eden Kretchet
11137 Freer Street
Temple City, CA 91780
T: (949) 600-0380
Plaintiff in propria persona

Following ordinary business practices, the envelope was sealed and placed for collection and mailing on this date, and would, in the ordinary course of business, be deposited with the United States Postal Service on this date.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on March 14, 2014, at Irvine, California.

Scott L. Pote

Estelle S. Pete

PROOF OF SERVICE BY MAIL

2 I, Estelle S. Pete, am a citizen of the United States and employed in Orange County,
3 California. I am over the age of eighteen years and not a party to the within-entitled action. My
4 business address is 3161 Michelson Drive, Suite 800, Irvine, California 92612-4408. I am
5 readily familiar with this firm's practice for collection and processing of correspondence for
6 mailing with the United States Postal Service. On March 14, 2014, I placed with this firm at the
7 above address for deposit with the United States Postal Service a true and correct copy of the
8 within document(s):

NOTICE OF FILING NOTICE OF REMOVAL

10 in a sealed envelope, postage fully paid, addressed as follows:

Following ordinary business practices, the envelope was sealed and placed for collection and mailing on this date, and would, in the ordinary course of business, be deposited with the United States Postal Service on this date.

17 I declare under penalty of perjury under the laws of the State of California that the above
18 is true and correct.

19 Executed on March 14, 2014, at Irvine, California.

Estelle S. Blo

Estelle S. Pete